

# **EXHIBIT B**



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24       Reported in Stenotype by:  
25       Cody R. Knacke, RPR, CSR No. 13691  
          Job No.: 886197

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7 (All Appearances Via Videoconference.)

8 APPEARANCES OF COUNSEL:

9 For the Plaintiff Lynne Freeman:

10 DONIGER/BURROUGHS  
11 BY: STEPHEN DONIGER, ESQ.  
12 603 Rose Avenue  
Venice, California 90291  
310.590.1820  
stephen@donigerlawfirm.com

14 CSREEDER  
15 BY: MARK PASSIN, ESQ.  
16 1766 Wilshire Boulevard, Suite 1470  
17 Los Angeles, California 90025  
18 310.861.2475  
19 mark@csrlawyers.com

17 For the Defendants Tracy Deeks-Elkenaney p/k/a  
18 Tracy Wolff, Entangled Publishing, LLC,  
Holtzbrinck Publishers, LLC d/b/a Macmillan,  
and Universal City Studios LLC:

20 COWAN, DEBAETS, ABRAHAMS & SHEPPARD  
BY: BENJAMIN HALPERIN, ESQ.  
CECE COLE, ESQ.  
21 41 Madison Avenue, 38th Floor  
New York, New York 10010  
22 212.974.7474  
bhalperin@cdas.com  
23 ccole@cdas.com

24

25

1 APPEARANCES OF COUNSEL: (Continued)

2 For Prospect Agency, LLC and Emily Sylvan Kim:

3 KLARIS LAW  
4 BY: LANCE KOONCE, ESQ.  
5 29 Little West 12th Street  
6 New York, New York 10014  
7 917.822.7468  
8 lance.koonce@klarislaw.com

9 Also Present:

10  
11 Rick Majewski, Videographer  
12 Lynne Freeman  
13 Tracy Wolff  
14 Emily Sylvan  
15  
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1 Q. I'm going to ask you a few personal  
2 questions, and I apologize if they're personal in  
3 nature, but I am entitled to ask them; so I'll try  
4 to stay minimally intrusive here.

5                   What's your age, Mr. Baer?

6 A. █.

7 Q. What's your date of birth?

8 A. █.

9 Q. Where do you live?

10 A. I live in Anchorage, Alaska, and I also  
11 live in Santa Barbara, California.

12 Q. Do you own the property where you live in  
13 Anchorage, Alaska?

14 A. Yes.

15 Q. Can you tell me the street address and town  
16 of that property.

17 A. The address is █, in  
18 Anchorage, Alaska. We recently sold another  
19 property there.

20 Q. Do you own the property where you live in  
21 California?

22 A. Yes.

23 Q. And can you please give me the address of  
24 that.

25 A. It is █

1 Santa Barbara, California [REDACTED].

2 Q. The properties that you have described, do  
3 you own them just yourself or jointly with your  
4 wife?

5 A. I own them jointly with my wife.

6 Q. How long have you lived at your current  
7 residence in Alaska?

8 A. The previous residence -- we just moved  
9 into this other residence because we sold the  
10 residence in November.

11 Q. How long did you live at the one before,  
12 the one you just sold?

13 A. That one, we lived in for -- I think it was  
14 2018 that we bought it, so four years.

15 Q. Are you originally from Alaska?

16 A. I am originally from Alaska.

17 Q. So if I'm understanding correctly, you and  
18 your wife split your time between California and  
19 Alaska; is that correct?

20 A. Correct.

21 Q. [REDACTED] [REDACTED]

22 [REDACTED]  
23 A. [REDACTED] [REDACTED] We spend a  
24 good portion of the summers and sometimes part of  
25 the winter in Alaska. And when it gets below --

1 40 below 0, we go to Santa Barbara.

2 Q. Sounds about right.

3 How many times a year would you say you go  
4 back and forth between California and Alaska?

5 A. [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 Q. [REDACTED]

9 A. [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 Q. When you travel back and forth between  
16 California and Alaska, how do you travel?

17 A. I was generally catching the red eye out of  
18 LA on a five-hour flight direct to Anchorage.

19 Q. So these are commercial flights, not  
20 private flights?

21 A. They are on Alaska Airlines, yeah.

22 Q. And is it the same for your wife?

23 A. Generally, yes. She would not take red  
24 eyes, though.

25 Q. Are you currently employed, Mr. Baer?